

[Counsel listed on signature page]

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

**IN RE: NATIONAL COLLEGIATE
ATHLETIC ASSOCIATION ATHLETIC
GRANT-IN-AID CAP ANTITRUST
LITIGATION**

**Case No. 4:14-md-02541-CW
Case No. 4:14-cv-02758-CW**

THIS DOCUMENT RELATES TO:
ALL ACTIONS

**STIPULATION AND ~~PROPOSED~~
ORDER RESETTING SCHEDULE FOR
INJUNCTIVE RELIEF CLASS
CERTIFICATION AS MODIFIED**

STIPULATION AND ~~PROPOSED~~ ORDER RESETTING SCHEDULE FOR INJUNCTIVE RELIEF CLASS
CERTIFICATION

MDL No. 4:14-md-02541-CW; Case No. 4:14-cv-02758-CW

1 WHEREAS, on November 14, 2014, Consolidated Plaintiffs and *Jenkins* Plaintiffs
2 (“Plaintiffs”) filed a joint motion for injunctive relief class certification;

3 WHEREAS, on February 20, 2015, Plaintiffs filed an amended joint motion for injunctive
4 relief class certification (the “Motion”);

5 WHEREAS, on April 30, 2015, Defendants filed a joint opposition to the Motion (the
6 “Opposition”);

7 WHEREAS, on June 26, 2015, Plaintiffs filed a joint reply in support of the Motion (the
8 “Reply”);

9 WHEREAS, Defendants’ joint brief in response to the Reply (the “Surreply”) is currently
10 due on August 20, 2015;

11 WHEREAS, the parties agreed to conduct depositions of Plaintiffs’ experts on August 25-27,
12 based on the availability and locations of all experts and counsel, which is after the current deadline
13 for the Surreply;

14 WHEREAS, the hearing on the Motion is scheduled for October 1, 2015; and

15 WHEREAS, the parties have previously agreed to modifications of the injunctive relief class
16 certification schedule and such modifications have been granted by the Court.¹

17 THEREFORE, the parties agree that the schedule should be modified as follows:

18 The Surreply will be due on September ⁸~~11~~, 2015; and

19 The October 1, 2015 hearing and Case Management Conference will remain unchanged.
20
21

22
23 ¹ See ECF No. 185 (resetting deadlines for the Opposition to February 13, 2015 and the Reply to
24 March 13, 2015, and resetting the hearing date to April 2, 2015); ECF No. 193 (resetting deadlines
25 for the Opposition to March 30, 2015 and the Reply to April 27, 2015, and resetting the hearing date
26 to May 14, 2015); ECF No. 209 (resetting deadlines for the Opposition to April 30, 2015 and the
27 Reply to May 28, 2015, and resetting the hearing date to June 18, 2015); ECF No. 210 (resetting the
hearing date to July 23, 2015); and ECF No. 228 (resetting deadline for the Reply to June 26,
providing Defendants an opportunity to file the Surreply by August 20, 2015, and resetting the
hearing date to July 23 or October 1, depending on Plaintiffs’ submission of expert reports and the
Court’s ruling on any objection by Defendants).

Dated: July 20, 2015

whurst@polsinelli.com

By: /s/ Karen Hoffman Lent

*Counsel for the Big 12 Conference, Inc. and
Conference USA*

Jeffrey A. Mishkin
Karen Hoffman Lent

**SKADDEN, ARPS, SLATE, MEAGHER &
FLOM LLP**

By: /s/ R. Todd Hunt

R. Todd Hunt

Four Times Square
New York, NY 10036
Telephone: (212) 735-3000
Facsimile: (917) 777-2000
jeffrey.mishkin@skadden.com

WALTER HAVERFIELD LLP

The Tower at Erievue
1301 E. 9th Street, Suite 3500
Cleveland, OH 44114-1821
Telephone: (216) 928-2935
Facsimile: (216) 916-2372
rthunt@walterhav.com

Raoul D. Kennedy

**SKADDEN, ARPS, SLATE, MEAGHER &
FLOM LLP**

Counsel for Mid-American Conference

525 University Avenue
Palo Alto, CA 94301
Telephone: (650) 470-4500
Facsimile: (650) 470-4570
raoul.kennedy@skadden.com

By: /s/ Mark A. Cunningham

Mark A. Cunningham

JONES WALKER

201 St. Charles Avenue
New Orleans, LA 70170-5100
Telephone: (504) 582-8536
Facsimile: (504) 589-8536
mcunningham@joneswalker.com

*Counsel for National Collegiate Athletic
Association and Western Athletic Conference*

By: /s/ Leane K. Capps

Counsel for Sun Belt Conference

Leane K. Capps

POLSINELLI PC

By: /s/ D. Erik Albright

D. Erik Albright

SMITH MOORE LEATHERWOOD LLP

Saint Ann Court
2501 N. Harwood Street, Suite 1900
Dallas, TX 75201
Telephone: (214) 397-0030
lcapps@polsinelli.com

300 North Greene Street, Suite 1400
Greensboro, NC 27401
Telephone: (336) 378-5368
Facsimile: (336) 433-7402
erik.albright@smithmorrelaw.com

Amy D. Fitts

POLSINELLI PC

120 W. 12th Street
Kansas City, MO 64105
Telephone: (816) 218-1255
afitts@polsinelli.com

Jonathan P. Heyl

SMITH MOORE LEATHERWOOD LLP

Wesley D. Hurst

POLSINELLI PC

2049 Century Park East, Suite 2300
Los Angeles, CA 90067
Telephone: (310) 556-1801

101 N. Tryon Street, Suite 1300
Charlotte, NC 28246
Telephone: (704) 384-2625
Facsimile: (704) 384-2625
jon.hey@smithmoorelaw.com

Charles La Grange Coleman, III
HOLLAND & KNIGHT LLP
 50 California Street, Suite 2800
 San Francisco, CA 94111-4624

Telephone: (415) 743-6900
 Facsimile: (415) 743-6910
 ccoleman@hklaw.com

Counsel for The Atlantic Coast Conference

By: /s/ Scott P. Cooper

Scott P. Cooper

Jennifer L. Jones

Jacquelyn N. Ferry

PROSKAUER ROSE LLP

2049 Century Park East, Suite 3200

Los Angeles, CA 90067

Telephone: (310) 557-2900

Facsimile: (310) 557-2193

scooper@proskauer.com

Counsel for Pac-12 Conference

By: /s/ Andrew S. Rosenman

Andrew S. Rosenman

Britt M. Miller

MAYER BROWN LLP

71 South Wacker Drive

Chicago, IL 60606-46537

Telephone: (312) 782-0600

Facsimile: (312) 701-7711

arosenman@mayerbrown.com

Richard J. Favretto

MAYER BROWN LLP

1999 K Street, N.W.

Washington, D.C. 20006-1101

Telephone: (202) 263-3000

Facsimile: (202) 263-3300

rfavretto@mayerbrown.com

Counsel for The Big Ten Conference, Inc.

By: /s/ Robert W. Fuller

Robert W. Fuller, III

Nathan C. Chase Jr.

Mark W. Merritt

Lawrence C. Moore, III

Amanda R. Pickens

ROBINSON BRADSHAW & HINSON

101 N. Tryon St., Suite 1900

Charlotte, NC 28246

Telephone: (704) 377-2536

Facsimile: (704) 378-4000

rfuller@rbh.com

Mark J. Seifert

Robert R. Moore

ALLEN MATKINS LECK GAMBLE

MALLORY & NATSIS LLP

Three Embarcadero Center, 12th Floor

San Francisco, CA 94111

Telephone: (415) 837-1515

Facsimile: (415) 837-1516

mseifert@allenmatkins.com

Counsel for Southeastern Conference

By: /s/ Adam Brezine

Adam Brezine

BRYAN CAVE LLP

560 Mission Street, 25th Floor

San Francisco, CA 94105

Telephone: (415) 674-3400

Facsimile: (415) 675-3434

adam.brezine@bryancave.com

Richard Young

Brent Rychener

BRYAN CAVE LLP

90 South Cascade Avenue, Suite 1300

Colorado Springs, CO 80903

Telephone: (719) 473-3800

Facsimile: (719) 633-1518

richard.young@bryancave.com

brent.rychener@bryancave.com

Counsel for Mountain West Conference

By: /s/ Benjamin C. Block

Benjamin C. Block

COVINGTON & BURLING LLP

One CityCenter
850 Tenth Street, NW
Washington, DC 20001-4956
Telephone: (202) 662-5205
Facsimile: (202) 778-5205
bblock@cov.com

Rebecca A. Jacobs (SBN 294430)
COVINGTON & BURLING LLP

One Front Street
San Francisco, CA 94111-5356
Telephone: (415) 591-6000
Facsimile: (415) 591-6091
rjacobs@cov.com

Counsel for American Athletic Conference

By: /s/ Jeffrey L. Kessler

Jeffrey L. Kessler
David G. Feher
David L. Greenspan
WINSTON & STRAWN LLP

200 Park Avenue
New York, NY 10166-4193
Telephone: (212) 294-6700
Facsimile: (212) 294-4700
jkessler@winston.com

Sean D. Meenan
WINSTON & STRAWN LLP

101 California Street
San Francisco, CA 94111
Telephone: (415) 591-1000
Facsimile: (415) 591-1400
smeen@winston.com

Counsel for Jenkins Plaintiffs
Plaintiffs' Interim Co-Lead Class Counsel

By: /s/ Steve W. Berman

Steve W. Berman
HAGENS BERMAN SOBOL SHAPIRO LLP

1918 Eighth Avenue, Suite 3300
Seattle, WA 98101
Telephone: (206) 623-7292
Facsimile: (206) 623-0594
steve@hbsslaw.com

By: /s/ Bruce L. Simon

Bruce L. Simon
Aaron M. Sheanin
Benjamin E. Shiftan
PEARSON, SIMON & WARSHAW, LLP

44 Montgomery Street, Suite 2450
San Francisco, CA 94104
Telephone: (415) 433-9000
Facsimile: (415) 433-9008
bsimon@pswlaw.com

Plaintiffs' Interim Co-Lead Class Counsel

By: /s/ Elizabeth C. Pritzker

Elizabeth C. Pritzker
Jonathan K. Levine
Bethany L. Caracuzzo
Shiho Yamamoto

PRITZKER LEVINE LLP
180 Grand Avenue, Suite 1390
Oakland, CA 94612
Telephone: (415) 692-0772
Facsimile: (415) 366-6110

Additional Class Counsel

ECF ATTESTATION

Pursuant to Civil Local Rule 5-1(i)(3), the filer of this document attests that concurrence in the filing of this document has been obtained from each of the other signatories above.

/s/ Jeffrey L. Kessler

Jeffrey L. Kessler

[~~PROPOSED~~] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED AS MODIFIED.

A handwritten signature in blue ink, appearing to read 'Claudia Wilken', is written over a horizontal line.

The Honorable Claudia Wilken
United States District Court Judge